Before the

Federal Communications Commission

Washington, D.C. 20554

In re Petition of:	)	
	)	
Octatron, Inc. and Chang Industry, Inc.	)	
	)	ET Docket No. 05-356
For Waiver of Sections 15.247(b), 15.247(e), and 15.249(a) of the Rules and Regulations	)	

BY ELECTRONIC FILING

AMENDMENT TO REQUEST FOR WAIVER

1. Octatron, Inc. and Chang Industry, Inc. ("Petitioners"), by their attorneys, hereby amend their Request for Waiver filed on November 28, 2005, ET Docket No. 05-356 ("Petition"), and provide additional information in support of their Petition.

2. In their Petition, the Petitioners requested to operate their devices in analog mode with up to 1 Watt of peak transmitter output power, which would allow for an EIRP limit of 4 Watts.[1] Through this filing, the Petitioners submit that as a condition to the granting of the requested waiver to operate in analog mode with up to 1 Watt of transmission power, that the EIRP limit will be reduced to 750 mW, approximately an eighty-one percent (81%) reduction from the 4 Watt limit that would otherwise be permitted for a device operating with 1 Watt of transmission power, and twenty-five percent (25%) less than the 1 Watt maximum transmission power being requested. This revised EIRP limit is requested for and would be applicable to both the Petitioners' Dragon Egg™ System

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[1] See Amendment of Parts 2 and 15 of the Commission's Rules Regarding Spread Spectrum Transmitters, *Report and Order*, 12 FCC Rcd 7488, at ¶ 4 (rel. April 10, 1997).

and the Pole Camera System. An EIRP limit of 750 mW will allow the devices to remain effective for law enforcement purposes while reducing any potential for interference. As it is the EIRP and not the actual transmission power that would lead to any interference, this reduction in the EIRP limit, coupled with the very limited operational use of the devices as to time and place, will significantly minimize the potential for interference, if any, with other devices in the 908-928 MHz band. The Petitioners note that, although a device submitted to the FCC for testing had an EIRP of 753 mW, the Petitioners would ensure that all devices subject to the requested waiver will not exceed an EIRP of 750 mW.

3. The Petitioners also supplement the record with data provided by the FCC laboratory with respect to the device with an EIRP measurement of 753 mW. This device, as tested by the FCC, had a PSD reading of 299.8 mW.[2]

4. The Petitioners further highlight that in the test data provided to the Petitioners, the FCC laboratory noted that "upon further radiation scans, no detectable emissions were found in both test sample units when measured at 3 meters."[3] This result indicates there is no out of band interference potential or extremely minor out of band interference potential. As also noted by the Petitioners in their Reply Comments, testing of the devices by the Petitioners has not revealed any emissions in the 896-901 MHz band.[4]

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2 See Exhibit A attached hereto.

3 Petitioners' Letter to the FCC, ET Docket No. 05-356, Exhibit A (September 8, 2006).

4 Petitioners' Reply Comments, ET Docket No. 05-356, ¶ 22 (February 14, 2006).

4. The Petitioners are, as disclosed in their letter of April 14, 2006, supportive of the same waiver conditions as in the Remington Waiver,[5] including the following: a) the devices will be marketed only directly to law enforcement organizations, b) the devices will only be used by law enforcement agencies for safety-of-life and for training purposes, and, c) the transmitters will not be used for permanent or fixed operations.

5. As also provided in the Remington Waiver, the Petitioners request that the waiver apply to the Petitioners' devices (both the Dragon Egg™ System and the Pole Camera System) and any subsequent models that have the same emission characteristics.

6. The Petitioners hereby restate their amended request that the FCC waive the application of 47 C.F.R. §§ 15.247(b)(3), 15.247(e), and 15.249(a) to Petitioners' devices and permit the devices to operate in analog mode with 1 Watt of transmission power and an EIRP of no more than 750 mW in the frequency range of 902-928 MHz.

Respectfully submitted,

OCTATRON, INC. and
CHANG INDUSTRY, INC.

February 15, 2007

By: _____

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[5] In the Matter of Remington Arms Company, Inc. Request for Waiver of Part 15 Regulations, *Order*, ET Docket No. 05-183, FCC 05-194, at ¶ 18 (rel. Nov. 18, 2005) ("Remington Waiver").

EXHIBIT A

Copiz, Adrian

From: Steven Dayhoff [Steven.Dayhoff@fcc.gov]
Sent: Tuesday, February 13, 2007 9:50 AM
To: Copiz, Adrian
Subject: RE: Octatron FCC testing

Hi Adrian:

Following is a summary of the test results for the Octatron video transmitters:

The peak EIRP RF powers for the Octatron device were 753 mW for the Pole unit, and 86.5 mW for the Egg unit.

The Power Spectral Density for the Octatron device were 299.8 mW for the Pole unit, and 34.4 mW for the Egg unit.

Sincerely,

Steve Dayhoff

FCC Laboratory